

SEALED**FILED****APR 24 2014****United States District Court**

NORTHERN

DISTRICT OF

UNITED STATES OF AMERICA

V.

COMPLAINT

RAJEANNA JENNE BROWN

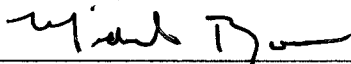
CASE NUMBER: 3-14-MJ- 300-BN

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about December 13, 2013 through December 24, 2013, in the Dallas Division of the Northern District of Texas, defendant(s) did, knowingly commit an offense of sex trafficking of a minor, in violation of Title 18, United States Code, Section(s) 1591(a) and (b)(2).

I further state that I am a(n) Special Agent with U.S. Homeland Security Investigations (HSI) and that this complaint is based on the following facts:

See attached Affidavit of Special Agent Michael P. Boone, (HSI) which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No



Signature of Complainant
MICHAEL P. BOONE
Special Agent, (HSI)

Sworn to before me and subscribed in my presence, on this 24th day of April, 2014, at Dallas, Texas.

DAVID L. HORAN
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer



Signature of Judicial Officer

AFFIDAVIT

I, Michael P. Boone, being duly sworn, declared and state as follows:

INTRODUCTION

1. I am a Special Agent with the United States Department of Homeland Security Investigations (HSI), assigned to the Special Agent in Charge in Dallas, Texas. I have been employed with HSI since July 2006. As part of my duties as an HSI agent, I investigate criminal violations relating to human trafficking and sex trafficking. I have received training in the area of human trafficking and sex trafficking, and have conducted multiple investigations concerning human trafficking and sex trafficking.

2. This affidavit sets forth facts and suggests reasonable inferences from those facts, establishing that there is probable cause to believe that on or about December 13, 2013, through December 24, 2013, in the Dallas Division of the Northern District of Texas, Rajeanna Jenne BROWN committed the offense of sex trafficking of a minor, in violation of 18 U.S.C. §§ 1591(a) and (b)(2) .

3. The information contained in this affidavit is from the affiant's personal knowledge of the described investigation and from information obtained from other law enforcement agents. This affidavit does not contain all the information gathered during the investigation, but rather it contains an overview of the investigation intended to establish probable cause exists that a criminal violation has occurred.

OVERVIEW OF INVESTIGATION

4. On January 21, 2014, the affiant received information about a possible

human trafficking victim from Traffick 911, an organization that routinely goes into the community giving presentations about human trafficking in locations such as schools, juvenile detention centers, community centers, religious centers and other places where they are invited to speak. That same day the affiant along with (HSI) Special Agent Allison Schaefer interviewed sixteen year old Jane Doe.

5. Jane Doe stated that in November of 2013, she ran away from home in Plano. In mid-December, she was walking alone on the street in Odessa, Texas when a woman named Ariel Staxx (later identified as Rajeanna BROWN) and another woman pulled up in a car. They asked Jane Doe if she was a prostitute, and she replied that she was, and they asked if she wanted a ride to Dallas, and she accepted the ride. BROWN and the other woman indicated they were also prostitutes.

6. BROWN took Jane Doe to an apartment in south Dallas, where she met a black male named Ladestro Douglas. Douglas was BROWN's pimp. In fact, he is currently on three years of probation Dallas County Case Number F-1258306 for Aggravated Promotion of Prostitution related to his pimping out of Brown when she was 17, and he is continuing to be involved in this criminal conduct. Jane Doe stated she stayed with BROWN and DOUGLAS for approximately two weeks from mid-December through December 24, 2013.

7. During this time period, Douglas and BROWN recruited, enticed, harbored, and facilitated Jane Doe to engage in commercial sex acts as well. Jane Doe stated that BROWN provided her with sexy lingerie and took pictures so that she

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could be posted on the website Backpage.com. Backpage.com is a website that is commonly used to advertise for commercial sex. BROWN then informed Jane Doe she would be posted on the website, so she needed to get ready to answer the phone because customers would be calling.

8. Jane Doe stated that soon thereafter she met her first customer. She said that an unidentified Hispanic male drive drove Jane Doe and BROWN to a hotel about 10 minutes away from the apartment where they were staying. Jane Doe said BROWN gave her a condom, which she used to have vaginal intercourse with an unknown white male. Jane Doe did not enjoy the experience and she wanted it to be over with as quickly as possible. He paid Jane Doe \$200.00, which Jane Doe gave to BROWN, who in turn gave it DOUGLAS. DOUGLAS hugged her, told her "thank you," and indicated he was impressed that Jane Doe could make so much money on her first time.

9. BROWN and Douglas continued to facilitate Jane Doe engaging in commercial sex acts. On approximately December 23, 2013, Jane Doe stated that BROWN posted her on Backpage.com again. She said that the same unknown Hispanic male drove her to the same hotel. BROWN again gave Jane Doe a condom which she used to have vaginal intercourse with an unknown male for \$200.00. After the sexual encounter, she gave the \$200.00 to BROWN, who then gave it to Douglas. Jane Doe stated that later that same day, she had vaginal intercourse with a third unknown male for \$80.00. Jane Doe said the \$80.00 also went to BROWN and then to

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Douglas.

10. Jane Doe stated that BROWN and Douglas deleted all of her Backpage.com postings because they knew she was sixteen, and they wanted to be careful. BROWN told Jane Doe that DOUGLAS had been arrested for compelling prostitution.

11. Along with causing Jane Doe to engage in commercial sex acts, Douglas himself had sex with Jane Doe twice as well.

12. Jane Doe eventually told Douglas and BROWN that she wanted to go home for Christmas. They agreed, but told her that she had to come back after the holidays. Jane Doe left.

13. BROWN subsequently contacted Jane Doe via Facebook and had a conversation with her about these events. With Jane Doe's consent, the affiant reviewed the Facebook conversation between Jane Doe and Facebook user "Ariel Property OfhisIzm." According to documentation obtained from Facebook, "Ariel Property OfhisIzm" is registered to a rajeanna.brown@Facebook.com; the images on the Facebook page are of BROWN.

14. The Facebook conversation between Jane Doe and BROWN took place January 1, 2014, shortly after Jane Doe returned home. In the conversation, it appears BROWN re-initiates contact with Jane Doe, likely hoping to recruit her back into commercial sex with BROWN and Douglas. When Jane Doe is not interested in communicating with BROWN anymore and she does not want to engage in

commercial sex acts any more, BROWN responds by saying "You say UR not a hoe anymore once a hoe always a hoe," among other things. Also, in the messages, BROWN acknowledges, in writing, that she knows that Jane Doe is 16 years old.

15. On January 29, 2014, evidence obtained from Backpage.com showed three postings that contained images of Jane Doe posted on December 23, 2013, with a telephone number of 205-552-****. Two were posted under the "Dallas Escorts" section and a third was posted under "Dallas Women Seeking Men." There were also multiple postings of BROWN under the name "Ayrial Staxx", with the same telephone number, 205-552-****. The postings were placed by account Email Aryial****@gmail.com. According to Backpage, these ads had been removed by the poster, which is consistent with Jane Doe's statement.

16. The Facebook photos of rajeanna.brown@Facebook.com matched Backpage.com photo postings for "Ayrial Staxx" with a telephone number (205) 552-****.

17. On February 27, 2014, the affiant and HSI Special Agent David Deal met with Jane Doe and showed her various photographs taken from Backpage.com. She positively identified BROWN (AKA Ayriel Staxx) in the photo array.

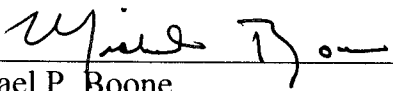
18. On April 11, 2014, affiant and Task Force Officer (TFO) Border Patrol Agent (BPA) Frank Varela contacted and met with BROWN, at approximately 5:00 pm, at the HSI office located at 125 E. John Carpenter, Irving, TX. The affiant informed BROWN that she was under investigation for human trafficking and we

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would like to speak with her concerning these matters. BROWN stated that she wanted to cooperate but wanted an attorney present with her. No further questions were asked concerning the investigation.

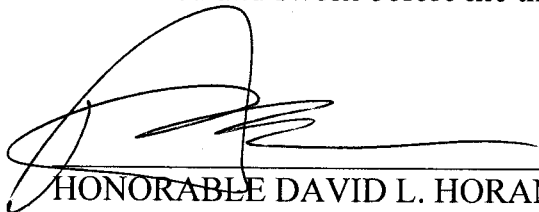
CONCLUSION

19. Based on the foregoing facts and circumstances, I respectfully submit that there is probable cause to believe that on or about December 13, 2013, through December 24, 2013, in the Northern District of Texas, Rajeanna Jenne BROWN committed the offense of sex trafficking a minor, in violation of 18 U.S.C. §§ 1591(a) and (b)(2).



Michael P. Boone
Special Agent
Department of Homeland Security Investigations

Subscribed and sworn before me this 24th day of April, 2014.



HONORABLE DAVID L. HORAN
United States Magistrate Judge
Northern District of Texas